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Inc.	
UNITED STATES	S DISTRICT C
DISTRICT	OF NEVADA
IRVING A BACKMAN, an individual:	
IRVING A. BACKMAN & ASSOCIATES,	Case No: 2:16
company; and G&B ENERGY, INC., a	STIPULATIO
Plaintiff,	EXTENDING ANSWER TO
	Joseph P. Schrage, Esq. (NSBN 11270)  MCDONALD CARANO WILSON, LLP 2300 West Sahara Avenue, Suite 1200 Las Vegas, NV 89102 Telephone: (702) 873-4100 Facsimile: (702) 873-9966 cnewby@mcwlaw.com jschrage@mcwlaw.com Michael C. Fee, Esq. (BBO No. 552796) (pro had Dennis M. Lindgren, Esq. (BBO No. 648007) (p PIERCE & MANDELL, P.C. Beacon Street, Suite 800 Boston, MA 02108 Telephone: (617) 720-2444 Facsimile: (617) 720-3693 mfee@piercemandell.com dennis@piercemandell.com  Attorneys for Irving A. Backman, Irving A. Backman Associates, LLC and G&B Energy, Inc.  UNITED STATES  DISTRICT  IRVING A BACKMAN, an individual; IRVING A. BACKMAN & ASSOCIATES, LLC, a Massachusetts limited liability company; and G&B ENERGY, INC., a Massachusetts corporation.

CHRISTOPHER M. GOGGIN, an individual; and C2 ENGINEERING SERVICES, INC., a

Defendant.

North Carolina corporation.

Case No: 2:16-cv-01108-JCM-PAL

**COURT** 

STIPULATION AND ORDER EXTENDING TIME FOR PLAINTIFFS' ANSWER TO COUNTERCLAIM

(First Request)

Pursuant to Local Rules IA 6-1, IA 6-2, and 7-1, plaintiffs Irving A. Backman, Irving A. Backman & Associates and G&B Energy, Inc (collectively, "Plaintiffs") and defendants Christopher M. Goggin and C2 Engineering Services, Inc. (collectively, "Defendants"), through their respective undersigned counsel, hereby stipulate and agree to extend the deadline for Plaintiffs to answer or

otherwise respond to Defendant's Amended Counterclaim (ECF No. 26) from July 11, 2016 to July

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2 18, 2016. ECR No. 26 was filed on June 23, 2016. 3 This is the first request by the parties. This stipulation is necessary because of the unavailability of Plaintiffs' lead counsel and in order to allow sufficient time for Plaintiffs to gather 4 5 further facts necessary to respond to the Counterclaim. The undersigned represent that this 6 stipulation is not designed for purposes of delay. 7 DATED this 8 day of July, 2016. 8 McDONALD CARANO WILSON LLP LEAH MARTIN LAW 9 By: /s/ Joseph P. Schrage By: /s/ Leah Martin Craig A Newby, Esq. (NSBN 8591) Leah Martin, Esq. 10 Joseph P. Schrage, Esq. (NSBN 11270) Rosalie Bordelove, Esq. 2300 West Sahara Avenue, Suite 1200 6671 S. Las Vegas Blvd. 11 Las Vegas, NV 89102 Suite D-210 cnewby@mcwlaw.com Las Vegas, NV 89119 12 ischrage@mcwlaw.com lmartin@leahmartinlv.com Attorneys for Irving A. Backman, Irving rbordelove@leahmartinlv.com 13 A. Backman Associates, LLC and G&B Attorneys for Christopher M. Goggin and C2 Engineering Services, Inc. Energy, Inc. 14 15 GRANTED this day of July, 2016 16 IT IS SO ORDERED. 17 18 19 DATED: July 20, 2016 20 21 Submitted by: 22 McDONALD CARANO WILSON LLP 23 24 /s/ Joseph P. Schrage Craig A Newby, Esq. (NSBN 8591) 25 Joseph P. Schrage, Esq. (NSBN 11270) 2300 West Sahara Avenue, Suite 1200 26 Las Vegas, NV 89102 cnewby@mcwlaw.com 27 jschrage@mcwlaw.com Attorneys for Irving A. Backman, Irving A. Backman Associates, LLC and G&B Energy, Inc. 28